

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Jamie & Tammy Atwood)	Chapter 13
Debtors)	Case No. 1:17-bk-05070
)	
M & T Bank)	
Movant)	
)	
Jamie & Tammy Atwood, Respondents)	
Charles DeHart, III, Trustee)	

**DEBTORS' RESPONSE TO MOTION OF M & T BANK MOTION FOR RELIEF FROM
THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY
PROCEDURE RULE 4001**

1. Movant, M & T Bank, filed its Motion for Relief on June 5, 2018.
2. Debtors anticipated they might miss a couple of payments post-petition and placed those anticipated arrears in their original plan.
3. Debtors will be filing an Amended Chapter 13 plan proposing to cure the correct amount of post petition arrears through their Chapter 13 plan.
3. Debtors desire the opportunity to cure any post-petition mortgage arrears and keep their home.
4. Debtors request the Court deny Movant's Motion for Relief.

WHEREFORE, Debtors, Jamie & Tammy Atwood, pray the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed on June 5, 2018 by M & T Bank.

Dated: June 19, 2018

Respectfully Submitted,

/s/Stephen Wade Parker
Stephen Wade Parker (315606)
Counsel for Debtor
Mooney & Associates
2 S. Hanover Street
Carlisle, PA 17013
Swp@mooney4law.com
(717) 243-4770 Phone
(717) 632-3612 Fax